IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LESLIE BOYD,

Plaintiff,

: Civil Action v. : No. 17-3195

CITY OF PHILADELPHIA, et al.,
Defendants.

DECLARATION OF DEPUTY WARDEN PATRICIA A. POWERS

- 1. My name is Patricia A. Powers and I am currently a Deputy Warden and the Director of the Policy and Audit Division for the Philadelphia Department of Prisons (hereinafter "PDP").
- 2. I have worked in the Policy and Audit Division since 2010, and I have been continuously employed by the PDP since October 25, 1993.
- 3. As a result of my position, I am familiar with general day-to-day operations at PDP facilities, including general inmate medical services.
- 4. During the period of January 1, 2016 through March 31, 2016, PDP contracted with Corizon Health, Inc. ("Corizon") for the provision of general medical services to inmates, including inmates at CFCF.
- 5. As part of its contractual duties, Corizon providers were responsible for reviewing inmate sick calls and scheduling inmate appointments with the appropriate Corizon providers, as necessary.
- 6. As a further part of its contractual duties, Corizon providers were responsible for determining what medical course of treatment, if any, to provide to an inmate.



- 7. As a result of my position, I am familiar with the PDP automated information systems, including the database field that describes an inmate's housing change summary, which is maintained in the PDP automated information system called Lock &Track ("LAT").
- 8. At the request of the Philadelphia Law Department, a search of the LAT housing change summary was conducted regarding the plaintiff, Leslie Boyd, and I have reviewed the results of this search. See Inmate Housing Change Summary of Inmate Leslie Boyd, DOB 12/06/1948, relevant portion attached as Exhibit A.
- 9. According to Exhibit A, the plaintiff entered CFCF, through Receiving, on December 31, 2015. *Id.*
- In addition to housing information, notes recorded by inmate Social Work Services
 Managers at CFCF are stored in Lock & Track.
- 11. Based upon a review of the notes recorded by the Social Work Services Managers assigned to plaintiff, Leslie Boyd, as maintained on Lock & Track, plaintiff met with an inmate Social Work Services Manager named K. Thomas on February 3, 2016. *See* Inmate Social Worker Notes from February 3, 2016, attached as Exhibit B.
- 12. K. Thomas recorded in the notes that on the date of the meeting February 3, 2016
 Plaintiff was utilizing a wheelchair. *Id*.
- 13. Along with the above information, every grievance submitted by an inmate at CFCF is logged in by the Deputy Warden for Administration of the facility in which the inmate is housed into the LAT system.
- 14. Based upon a review of the grievances filed by plaintiff, Leslie Boyd, as maintained on Lock & Track, plaintiff submitted a grievance on March 15, 2016 requesting a new wheel chair. *See* Grievance submitted March 15, 2016, attached as Exhibit C.

- 15. The records indicate that the request was processed on March 17, 2016.
- 16. I certify that all the attached exhibits are true copies of official PDP inmate records of Leslie Boyd, the plaintiff in this civil action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Patricia A. Powers

12/19/19

Deputy Warden/Director of Policy & Audit Philadelphia Department of Prisons

_	-	-					
.n	MoveIn	Out	MoveOut	Facility	Unit	Cell	Bed
<u> 10VE </u>	04/12/2016	PROGRAM	06/03/2016	DC	PHSW	S212-0	1
10VE	04/12/2016	MOVE	04/12/2016	DC	PHSW	TRANSF	01
RANSFER	04/12/2016	MOVE	04/12/2016	DC	RCVG	B10	02
10VE	03/27/2016	TRANSFER	04/12/2016	CFCF	OPENWA	ARIA-T	10
10VE	03/27/2016	MOVE	03/27/2016	CFCF	OPENWA	TRANSF	01
10VE	01/08/2016	MOVE	03/27/2016	CFCF	C1POD1	13	1
10 VE	01/08/2016	MOVE	01/08/2016	CFCF	C1POD1	TRANSF	03
10VE	01/08/2016	MOVE	01/08/2016	CFCF	B1P0D2	TRANSF	32
10VE	01/01/2016	MOVE	01/08/2016	CFCF	B1P0D2	08	1
10VE	01/01/2016	MOVE	01/01/2016	CFCF	B1P0D2	TRANSF	27
.ODGE	12/31/2015	MOVE	01/01/2016	CFCF	RCVG	B30	07
10VE	02/13/2015	ELEC-MON	09/16/2015	PICC	KUNIT	RM02	2
10VE	02/13/2015	MOVE	02/13/2015	PICC	KUNIT	TRANSF	04
RANSFER	02/13/2015	MOVE	02/13/2015	PICC	RCVG	115	03
			PgUp——PgDn GoBack	F9	F10-	F11	F12

13 04/14/2015 14:39 TULLER M

Summary: IM was granted a to to A.Boyd(267)507-8536

14 04/17/2015 14:20 TULLER M

Summary: IM requested an update on the Notary. Important documents.

15 06/15/2015 14:35 TULLER M

Summary: 75 day/UAF f/u completed.Next review:09/08/2015 Leslie Boyd pp#402203,inmate states that he is okay and that he is complinat with his medication treatment plan.Legal status reviewed.06-15-2015

M.Tuller SWSMII

16 09/15/2015 10:26 TULLER M

Summary: 75 day/UAF f/u completed.Next review:12/4/2015 Leslie Boyd pp#402203,inmate states that he is okay and that he is compliant with his medication treatment plan.IM informed SW that he was cleared for house arrest;however,he waiting for an inspector to come to his house first.Legal status reviewed.09-15-2015 M.Tuller,SWSMII

17 01/03/2016 17:45 THOMAS KA

Summary: UAF done;5 alerts/0 seps;MED/MH hx;retired/disabilty; t/c January 3, 2016 Boyd, Leslie PP# 402203

Five alerts and 0 separations noted. Intake completed. Rev'd chrgs but he is not yet processed in the system. Updated emergency contact. Allowed t/c to Kim 267.229.1177, whom answered.

I/m is a 67 y/o, AA male, single, 1 daughter 12/son 28 y/o. Denied any drug usage.

Education: Has a 2nd grade education from Pierce Elementary School.

Employment: He is retired from the garment industry/disabled and collects SS.

Medical: Wears glasses, HBP, hernia disk, enlarged prostate. Prescribed meds.

K.Thomas, SWSMII

18 01/07/2016 12:08 THOMAS_KA

Summary: 5 dys F/U completed - Next scheduled interview 2/5/2016 January 7, 2016 Boyd, Leslie Pp# 402203

SWSM met with inmate to complete 5 day follow up. Inmate was calm and cooperative during follow up. Inmate reports that he has no suicidal/homicidal ideations at this time. Inmate reports no problems on his unit at this time. Inmate reports that he has no mental health or medical concerns at this time. SWSM contacted CMR twice to inquire on the charges behind his incarceration but the telephone line was busy. I/m then admitted he is currenlty on house arrest and needs to secure another temporary residence before his HA can be reestablished again. He attended crt on 1/6/16. T/c made to Kim @ 267.229.1177 & Ms. Sharon church member @ 267.474.5203, whom both answered. Inmate is adjusting well at this time.

K.Thomas, SWSMII

19 02/03/2016 09:28 STANFORD T

Summary: inmate seen for 30 day. UAF, SDP, RST. next f/u: 04/18/2016

02-03-2016 Boyd, Leslie C. pp# 402203

Inmate seen for 30 day follow up interview. the UAF and SDP were completed. The Risk Screening Tool was completed, inmate scored a "Low" risk and no correctional planning was indicated. Inmate is hopeful to be leaving at his next court date (February 16th). Inmate has numerous health concerns including high blood pressure and diabetes as well as a herniated disc. Inmate utilizes a wheelchair. Inmate tried call his friend Kim Hughes @ ph. 267-229-1177 but it was not successful. Inmate did reach his friend Sharon @ ph. 267-474-5203 and spoke with her for a couple of minutes. No other issues or concerns were discussed at this time.

T. Stanford swsm II
20 04/18/2016 14:34 CHRISTMAS_M
Summary: uaf 75 day fol up, six alerts, p/c to daughter
Leslie Boyd 402203

Inmate was discharged from open ward, currently housed in PHSW 112 inpatient medical unit, Tx herniated disc, diabeties, confined to wheechhair, also being followed by BHU, fol up sched 4/19/16, denied suicidal thoughts, appeared alert stable.

I/m is scheduled for sentencing 5/13/16,p/c's granted to daughter Aisha 267-979-2074,friend Kim Hughes 267-229-1177 at length. There were no further concerns

M.Christmas SW 4/18/16

21 05/06/2016 15:40 CHRISTMAS_M

Summary: Fol up, p/c fr PD Ms Buck, discharge plan reviewed

22 05/16/2016 14:12 CHRISTMAS_M

Summary: Follow up Leslie Boyd 402203

Inmate is housed in PHSW 212 inpatient medical unit, sentenced 5/13/16, Sheriff tol transport to Freedom House, MA compass application initiated. I/m is confined to wheelchair at this time, receiving physical therapy.

M.Christmas SW 5/16/16

23 05/23/2016 14:46 TOMLIN L

Summary: MIN PIAS CP51CR00028552015 submitted to SWS for review

24 05/25/2016 16:45 HALL AR

Summary: PIAS CP51CR00028552015 FORWARD TO APPD & PD

25 05/26/2016 15:23 CHRISTMAS M

Summary: PC fr PD Ms Buck, i/m trans date to program confirmed

26 05/27/2016 12:57 CHRISTMAS M

Summary: Follow up, informed of trans date, consult staff Dr

Philadelphia Prison System Grievances

Inmate 402203 BOYD, LESLIE

Grievance G160947
Type MEDICAL
Status RESOLVED
SubType MEDICAL
Submitted 03/15/2016 00:00
Logged 03/15/2016 00:00
Facility CFCF
Location C1POD1
Occurred 02/29/2016 00:00
Processed 03/17/2016 13:11 by BRITTING_T

INMATE REQUESTING A NEW WHEEL CHAIR.